

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

IN RE MYLAN N.V. SECURITIES
LITIGATION

Master File No. 2:20-cv-00955-NR

CLASS ACTION

**STIPULATION AND ORDER SETTING
SCHEDULE FOR FILING OF
CONSOLIDATED AMENDED COMPLAINT
AND MOTION TO DISMISS BRIEFING**

Lead Plaintiff Public Employees' Retirement System of Mississippi ("PERS") and Defendants Mylan N.V., Heather Bresch, Rajiv Malik, Anthony Mauro, and Kenneth Parks ("Defendants," and together with PERS, the "Parties"), hereby stipulate and agree as follows:

WHEREAS, on September 2, 2020, the Court entered an Order granting the Parties' joint stipulation to extend Defendants' time to respond to the Complaint pending the appointment of a lead plaintiff and the filing of an operative complaint by such lead plaintiff (ECF No. 21);

WHEREAS, pursuant to the Parties' joint stipulation, the Parties agreed to submit to the Court a proposed schedule for filing an amended complaint and briefing on any motion(s) to dismiss or response thereto within fourteen (14) days of the entry of an order appointing lead plaintiff and lead counsel;

WHEREAS, on September 14, 2020, the Court entered an Order appointing PERS as Lead Plaintiff, and approving its selection of Bernstein Litowitz Berger & Grossmann LLP and Kessler Topaz Metzler & Check LLP as Lead Counsel (ECF No. 23);

WHEREAS, following the appointment of Lead Plaintiff and Lead Counsel, the parties met and conferred and agreed on a schedule for Lead Plaintiff to file its consolidated amended complaint and for Defendants' responses thereto;

WHEREAS, the Parties have agreed to the schedule stipulated below to accommodate the Parties' existing litigation schedules and Covid-19-related logistical challenges;

NOW, THEREFORE, the Parties hereby stipulate and agree and respectfully request that the Court enter an Order as follows:

1. Lead Plaintiff shall file its Consolidated Amended Complaint ("CAC") on or before November 13, 2020;
2. Defendants shall move to dismiss, answer, or otherwise respond to the CAC on or before January 19, 2021;
3. Should Defendants move to dismiss the CAC, Lead Plaintiff shall file a response to the motion on or before March 16, 2021; and
4. Defendants shall file a reply in further support of the motion on or before April 30, 2021.

DATED: September 23, 2020

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

/s/ Katherine M. Sinderson
Katherine M. Sinderson
Abraham Alexander
Kate W. Aufses
1251 Avenue of the Americas
New York, NY 10020
Tel.: (212) 554-1400
Fax: (212) 554-1144
katiem@blbglaw.com
abe.alexander@blbglaw.com
kate.aufses@blbglaw.com

**KESSLER TOPAZ METZLER
& CHECK LLP**

Andy Zivitz
Eli Greenstein
280 King of Prussia Road

**PIETRAGALLO GORDON ALFANO
BOSICK & RASPANTI, LLP**

/s/ William Pietragallo II
William Pietragallo II (PA I.D. #16413)
John A. Schwab (PA I.D. #89596)
One Oxford Centre, 38th Floor
Pittsburgh, PA 15219
Tel.: (412) 263-1818
Fax: (412) 263-4200
wp@pietragallo.com
jas@pietragallo.com

**WILSON SONSINI GOODRICH &
ROSATI, P.C.**

Nina F. Locker
650 Page Mill Road
Palo Alto, CA 94304
Tel.: (650) 493-9300
Fax: (650) 565-5100

Radnor, PA 19087
Tel.: (610) 667-7706
Fax: (610) 667-7056
azivitz@ktmc.com
egreenstein@ktmc.com

*Counsel for Lead Plaintiff and
Lead Counsel for the Class*

WEISS BURKARDT KRAMER LLC

M. Janet Burkhardt (PA I.D. #85582)
445 Fort Pitt Boulevard, Suite 503
Pittsburgh, PA 15219
Tel.: (412) 391-9890
Fax: (412) 391-9685
jburkardt@wbklegal.com

Liaison Counsel for Lead Plaintiff

nlocker@wsgr.com

Michael S. Sommer
Jessica L. Margolis
Sheryl Shapiro Bassin
1301 Avenue of the Americas, 40th Floor
New York, NY 10019-6022
Telephone: (212) 999-5800
Facsimile: (212) 999-5801
msommer@wsgr.com
jmargolis@wsgr.com
sbassin@wsgr.com

Counsel for Defendants

SO ORDERED this 24th day of September, 2020.

s/ J. Nicholas Ranjan
The Honorable Nicholas Ranjan
United States District Court Judge